facilities, plus the features, functions, and capabilities of the switch."[531] In addition, "local switching includes all vertical features that the switch is capable of providing, as well as any technically feasible customized routing functions."[532] Furthermore, satisfaction of this checklist item requires that the unbundled local switching provided enable the CLEC "to offer, and bill for, exchange access and the termination of local traffic."[533]

The FCC's Local Competition Order further requires that, pursuant to Section 251 of the Act, an ILEC must: (a) provide nondiscriminatory access to line-side and trunk-side facilities plus the features, functions, and capabilities of the switch;[534] (b) provide nondiscriminatory access to trunk ports on a shared basis, and routing tables resident in the BOC's switch, as necessary to provide nondiscriminatory access to shared transport facilities;[535] and (c) provide nondiscriminatory access to unbundled tandem switching, which includes the facilities connecting trunk distribution frames to the tandem switch and all functions of the switch itself, including those that establish a temporary transmission path between two other switches.[536]

2.   VZ-RI's Position

A.   Nondiscriminatory Access to Local Switching

VZ-RI asserted that it provides CLECs with the same unbundled local switching as the FCC approved for Verizon in Massachusetts and New York. VZ-RI indicated that even the methods, practices and procedures employed by VZ-RI are the same as those

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[531] New York Order, ¶ 343.
[532] Id.
[533] Id.
[534] 47 C.F.R. §51.319(c)(1)(i); Local Competition Order, ¶ 412.
[535] Local Competition Third Reconsideration Order, ¶¶ 25-29.
[536] 47 C.F.R. §51.319(c)(2); Local Competition Order, ¶ 425, 426.

used by Verizon in Massachusetts and New York. Therefore, VZ-RI stated that it has

satisfied Checklist Item 6.[537]

VZ-RI noted that its interconnection agreements include specific rates, terms and

conditions that require it to provide local switching consistent with the requirements of

Section 251 of the Act. These agreements require VZ-RI to provide access to line-side

and trunk-side facilities of the local (end office) switch, basic switching functions, trunk

ports on a shared basis, tandem switching, vertical switch features, customized routing,

and usage information to bill for inter/intraLATA exchange access.[538]

According to VZ-RI, it offers access to local switching at each of its central

offices, and provides a cross-connect between a line port or trunk port and a CLEC's

collocation arrangement. VZ-RI also indicated that it offers access to tandem switching

at each tandem switch and provides a cross-connect between a trunk port and a CLEC's

collocation arrangement.

VZ-RI represented that it offers several types of local switch ports under

interconnection agreements or Part B, Section 6 of PUC RI No. 18 Tariff: (1) analog line

(for the provision of POTS-type service, PBX or Centrex capabilities); (2) basic rate

ISDN ("ISDN-BRI"); (3) Integrated Digital Loop Carrier ("IDLC"); (4) Electronic Key

Telephone Port ("EKTP"); (5) Coin Telephone; (6) Public Access Line; and (7) SMDI II.

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[537] Verizon's Post Hearing Brief, p. 83.

[538] Verizon RI 271 Filing – Checklist Declaration, ¶ 237. See Checklist Declaration Attachment B. Verizon RI's PUC RI No. 18 Tariff also contains provisions that require VZ-RI to provide tandem and local switching facilities to CLECs pursuant to the requirements of Section 251 of the Act. See PUC RI No. 18 Tariff, Part B, Section 4 for Tandem Switching, and Section 6 for Local Switching. VZ-RI also noted that TELRIC-based rates, terms and conditions for VZ-RI's UNE switching and UNE-P combinations have been established by the RIPUC in Docket No. 2681. Verizon RI 271 Filing – Checklist Declaration, ¶ 238. See also RIPUC Order 16808 (issued December 3, 2001).

VZ-RI also indicated that it makes trunk ports with line treatment, DS1 DID/DOD/PBX and primary rate ISDN ("ISDN-PRI") available.[539]

VZ-RI stated that the local switch functions and capabilities resident in a VZ-RI switch are made available with local switching, including those capabilities that VZ-RI uses to provide retail services. VZ-RI indicated that it will provide CLECs with access to the capabilities available in a switch, for the port type requested, on a line-by-line basis.[540] In addition, according to VZ-RI, shared tandem trunk ports will be provided upon a carrier's request when the traffic is routed through VZ-RI's tandem using VZ-RI's existing trunk groups and routing.[541]

VZ-RI represented that local switching may be combined with shared transport to enable CLECs to route their traffic over VZ-RI's network in the same way that VZ-RI routes traffic for its own end users. VZ-RI further represented that it will provide local switching, upon request, using customized routing based on class-of-call.[542]

VZ-RI indicated that it also provides CLECs with a combination of unbundled network elements known as UNE-P.[543] VZ-RI explained that in a UNE-P combination, VZ-RI provides CLECs with a pre-existing or new combination of an unbundled local

[539] Verizon RI 271 Filing – Checklist Declaration, ¶ 240. According to VZ-RI, descriptions of the major available local switch port offerings are contained in Sections 2.4, 2.5 and 2.7 of Volume III of the CLEC Handbook.

[540] Verizon RI 271 Filing – Checklist Declaration, ¶ 241. According to VZ-RI, some features are optional, and CLECs can activate them at the time VZ-RI provisions the line port or anytime after initial provisioning. According to VZ-RI, a CLEC may differentiate its service offering(s) by packaging individual switch features differently or by offering a variety of pricing packages; for example, providing Caller ID free-of-charge to all of its end users. VZ-RI has indicated that descriptions of major switch features available on individual line port types are contained in Sections 2.4 and 2.5 of Volume III of the CLEC Handbook.

[541] Verizon RI 271 Filing – Checklist Declaration, ¶ 242. Tandem switching consists of dedicated tandem trunk ports, shared tandem trunk ports, and tandem usage as described in Part B, Section 4 of PUC RI No. 18 Tariff. Dedicated tandem trunk ports consist of DS1 bandwidth capable of supporting 24 voice grade equivalent trunks. These trunk ports include associated signaling and transmission options. Id.

[542] Verizon RI 271 Filing – Checklist Declaration, ¶ 243; Verizon Post-Hearing Brief, p. 84.

loop network element and an unbundled local switching network element. The
unbundled local switching element provided within the UNE-P combination offers
CLECs access -- as requested by a CLEC via the NDR process described below -- to
other unbundled network elements. These elements include Common Transport or
Dedicated Transport, Shared Tandem Switching, Signaling Systems and Call-related
Databases, E911, and/or Directory Assistance services and Operator Services.
Collocation is not required to access local loop and local switch port UNE-P
combinations.[544]

VZ-RI represented that it will also combine unbundled local switching with other
UNEs or with VZ-RI services, subject to technical feasibility. VZ-RI will also provide
common interoffice transport in conjunction with shared trunk ports to CLECs that
purchase common interoffice transport. All UNE-P lines currently in service combine
these types of UNEs. Collocation is not required, provided that the terminating location
is normally accessed in the VZ-RI central office from which CLECs have purchased an
unbundled switch line port. VZ-RI indicated that it will also provide dedicated
interoffice transport in conjunction with a dedicated trunk port to CLECs that purchase
dedicated interoffice transport.[545]

B.   Provisioning of unbundled local switching

VZ-RI asserted that it has taken the requisite steps to ensure the commercial
availability of local switching to CLECs.   VZ-RI explained that provisioning of
unbundled local switching on a standalone basis is a two-step process. For new lines, the

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[543] Verizon RI 271 Filing – Checklist Declaration, ¶ 244. UNE-P enables CLECs to provide residential and
business local exchange services, and exchange access service, to their end-users.
[544] Verizon RI 271 Filing – Checklist Declaration, ¶ 244-245. Massachusetts Order, ¶ 119.

first step involves establishing the proper class of service, while the second step involves establishment of the cross-connection between the local switch port and the CLEC's collocation arrangement. For existing lines, the first step involves implementation of the translations needed to change the class of service to that associated with the CLEC's local unbundled switching, while the second step involves moving the existing cross-connection from the local switching port to the CLEC's collocation arrangement. CLECs may order services on behalf of their subscribers through industry standard ordering guidelines via a LSR.[546]

VZ-RI has developed and offers two NDR options to CLECs. Option A provides switch routing that is specific to the individual CLEC, and Option B consists of standardized blocking options and the replication of VZ-RI's routing and dialing plans. The NDR process is a joint CLEC/VZ-RI responsibility.[547] VZ-RI has indicated that it uses the same methods, practices and procedures to establish UNE switching translations through the NDR process as are used by VZ-MA and approved by the FCC.[548]

With Option A, VZ-RI develops customized Office Dialing Plans ("ODPs") and Line Class Codes ("LCC") to meet a CLEC's specific requirements for routing instructions, default features, and the creation of appropriate billing and usage records. CLECs can use VZ-RI-provided Operator Services/Directory Assistance ("OS/DA"), they can provide their own, or they can use a third-party's OS/DA services. Option A is

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[545] Verizon RI 271 Filing – Checklist Declaration, ¶ 246. These include shared or dedicated interoffice transport, shared tandem switching, SS7 signaling and access to E911. Operator Services and Directory Assistance service are available on an optional basis._Id._

[546] Verizon RI 271 Filing – Checklist Declaration, ¶ 247.

[547] Id. at ¶ 248. The terms and conditions applicable to the NDR process are included in the CLEC Handbook (Vol. 1, Section 6.4.2). The NDR process was reviewed by KPMG in the Massachusetts review and passed every test criteria. See KPMG MA Report, pp. 583-591.

[548] Verizon RI 271 Filing – Checklist Declaration, ¶ 248. See Massachusetts Order, ¶ 222.

defined by CLECs, thus offering them the flexibility to customize routing and blocking and to modify the ODP without affecting other CLECs or VZ-RI.[549]

VZ-RI also offers a "standardized" UNE Switching configuration called Option B. The standardized ODPs and LCCs mimic the local call routing and customer features used by VZ-RI itself. Option B affords CLECs the shortest interval to obtain a ubiquitous switch presence in Rhode Island. Because VZ-RI has pre-built switch functions, the timeframe for completing an NDR for Option B is 45 business days. With Option B, CLECs purchase VZ-RI's OS/DA platform, which includes three branding (announcement) options: (1) Verizon branding; (2) no branding; and (3) a CLEC's own branding. Regardless of the branding option chosen, CLECs can establish their own rates for these services, or they can adopt VZ-RI's retail rate schedule.[550]

Through the beginning of October 2001, 13 CLECs had completed the NDR process. Of these CLECs, three have chosen to use VZ-RI's OS/DA branding, four CLECs are unbranded, and the remaining six CLECs are using their own branding. All of the NDRs were completed within the established 45 business day interval.[551]

C.   Provisioning of unbundled tandem switching

VZ-RI asserted that it provides tandem switching access to CLECs that use UNE Switching. CLECs that use VZ-RI's UNE Switching do not have to separately request unbundled tandem switching because it is part of unbundled shared transport and can be accessed via every unbundled local switching element.[552]

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[549] Verizon RI 271 Filing – Checklist Declaration, ¶¶ 249-252.
[550] Id. at ¶¶ 253.
[551] Tr. 10/15/01, p. 88; Verizon RI 271 Filing – Checklist Declaration, ¶ 254.
[552] Verizon RI 271 Filing – Checklist Declaration, ¶ 255.

Through the beginning of October 2001, VZ-RI had not received any requests for unbundled tandem switching on a standalone basis; however, VZ-RI indicated that it will provide this UNE upon request.[553]

D.   Access to UNE switching

VZ-RI stated that it uses the same personnel, facilities and equipment to provision CLEC orders for local and tandem switching as it does to provision its own retail orders. According to VZ-RI, the only differences between the two provisioning processes are the unique characteristics of unbundled switching elements. That is, CLECs purchasing unbundled local and tandem switching elements are provided with usage recording suitable for billing exchange access charges to IXCs in the same manner that VZ-RI bills IXCs for exchange access service. VZ-RI provides this functionality by suppressing its exchange access billing on the switching elements it provides to CLECs. According to VZ-RI, this approach is the same one used by VZ-MA in its successful Section 271 application to the FCC.[554]

Through May 2001, VZ-RI had provided approximately 4,000 local switching ports on a line-side basis as part of UNE-P combinations that include a UNE loop. By September 2001, VZ-RI reported this number to be 3,975. However, the ratio of residential lines to business lines had increased: business customers now consisted of 3,525 lines rather than 3,600 lines and residential customers were up to 430 from 400.[555]

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[553] Tr. 10/15/01, p. 88-9; Verizon RI 271 Filing – Checklist Declaration, ¶ 256. This UNE is available through interconnection agreements and the PUC RI No. 18 Tariff. See Checklist Declaration Attachments B and C.
[554] Verizon RI 271 Filing – Checklist Declaration, ¶ 257.
[555] Id. at ¶ 258; Tr. 10/15/01, pp. 89-90.

3. CLEC Comments

No CLEC filed any declarations or made any comments at the hearings disputing VZ-RI's performance in providing the required access under Checklist Item 6.

4. RIDPUC Comments

The RIDPUC noted that "based on our analysis of the FCC's decisions in Massachusetts and New York, it appears as though Verizon in this state has complied with anything that the FCC would require with respect to a 271 application."[556] The RIDPUC recommended the RIPUC find that VZ-RI had complied with Checklist Item 6.[557]

5. RIPUC Findings and Recommendation

The RIPUC finds VZ-RI to be in compliance with the requirements of Checklist Item 6. We note VZ-RI provides CLECs with the same unbundled local switching as in New York and Massachusetts and provides CLECs with a combination of unbundled network elements known as UNE-P. VZ-RI has shown that between May and October 2001, there were 13 CLECs established to use VZ-RI's UNE switching arrangements and all of the NDRs had been completed within the established 45 business days interval. In addition, VZ-RI had shown through September 2001, that it had provided approximately 3,975 local switching ports on a line-side basis as part of UNE-P combinations that include a UNE loop.

A review of VZ-RI's metric performance for provisioning UNE-P from March through August 2001 was satisfactory. We note that VZ-RI's performance was not as

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[556] Tr. 10/15/01, p. 97.
[557] RIDPUC's Exhibit 1, Appendix A, p. 6.

superior as VZ-MA's performance from March through July 2000.[558] However, VZ-RI met three of the four PAP metrics for UNE-P provisioning in a majority of the six months.[559] The only metric in which VZ-RI had experienced some difficulty was PR-3-09 (% complete within 5 days:1-5 Lines Dispatch), but VZ-MA experienced comparable difficulty meeting this metric in Massachusetts during 2000.[560] In addition, we determined that VZ-RI's performance in UNE-P provisioning is likely due to the low volume of wholesale orders in Rhode Island which can produce poor results for wholesale performance if there are problems with one or two orders in particularly where there is a high volume of retail orders. For instance, in August 2001, VZ-RI did not satisfy metric PR-3-09 because of problems with only two out of 13 wholesale orders while in comparison there were 625 retail orders.[561] Therefore, we find that VZ-RI provides CLECs with non-discriminatory access to VZ-RI's local switching and recommend the FCC find VZ-RI's local switching to be in compliance with this checklist item.

G. CHECKLIST ITEM 7 – 911/E911, DIRECTORY ASSISTANCE, OPERATOR CALL COMPLETION SERVICES

1. Applicable Law

Section 271(c)(2)(B)(vii) requires VZ-RI to provide "nondiscriminatory access to (I) 911 and E911 services; (II) directory services to allow the other carrier's customers to obtain telephone numbers; and (III) operator call completion services."[562]

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[558] Compare Verizon RI 271 Filing-Measurements Declaration, Attachment 5, p. 13 to VZ-RI's Response Record Request No. 2 (VZ-MA's PAP metrics).

[559] Verizon RI 271 Filing-Measurements Declaration, Attachment 5, p. 9.

[560] VZ-RI's Response to Record Request No. 2 (VZ-MA PAP metrics for Checklist Item 6).

[561] Tr. 10/15/01, p. 77.

[562] 47 U.S.C. § 271(c)(2)(B)(vii)

The FCC has previously indicated that access to 911/E911 services must be

provided to CLECs on a parity basis, i.e., the database for CLEC customers must be as

accurate as that maintained for VZ-RI's retail customers.[563] Specifically, VZ-RI must

> (a) maintain the 911 database entries for competing LECs with the same accuracy and reliability that it maintains the database entries for its own customers;" and with regard to facilities-based carriers: (b) "provide unbundled access to its 911 database and 911 interconnection, including the provision of dedicated trunks from the requesting carrier's switching facilities to the 911 control office at parity with what the BOC provides to itself.[564]

Operator call completion services include "any automatic or live assistance to a

consumer to arrange for the billing or completion, or both, of a telephone call," including

busy line verification, emergency interrupt, and operator-assisted directory assistance.[565]

In order to satisfy the requirements of this part of the checklist, VZ-RI must be in

compliance with rules implementing § 251(b)(3).[566] CLECs may provide these services

through their own facilities or by reselling VZ-RI's services.[567] Although the FCC has

concluded that the rates for directory assistance and operator services do not have to be

based upon forward-looking economic costs, the services must still be provided at rates

and conditions that are just and reasonable.[568]

2. VZ-RI's Position

VZ-RI asserted that it meets these checklist requirements by offering CLECs

nondiscriminatory access to E911 services, directory assistance services and operator call

completion services under tariffs and RIPUC-approved interconnection agreements.[569]

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[563] New York Order, ¶ 349.
[564] Ameritech Michigan Order, 12 FCC Rcd at 20679; New York Order, ¶ 350.
[565] Texas Order, ¶ 346.
[566] Id.
[567] Id. at ¶ 347.
[568] Id. at ¶ 348.
[569] Verizon RI 271 Filing - Checklist Declaration, ¶ 260.

A.   911/E911 Access

VZ-RI stated that the same options regarding 911/E911 services are available in Rhode Island as in Massachusetts and New York. First, a reseller may resell VZ-RI's retail exchange service. Second, a CLEC purchasing VZ-RI's unbundled local switching may use a VZ-RI-furnished dial tone to provide E911. Third, a CLEC that uses its own switch may interconnect with VZ-RI's network. With these arrangements, CLEC customers are able to dial 911 to reach an emergency-services provider in the same manner as VZ-RI's retail customers.[570]

According to VZ-RI, E911 trunks provided to CLECs by VZ-RI are provisioned, maintained, and repaired on a first-come, first-served basis, using the same facilities, equipment and personnel that VZ-RI uses for the trunks serving its retail customers.[571] VZ-RI stated that it is providing interconnection to CLECs at each of its two E911 tandems. As of May 31, 2001, 11 CLECs had interconnected to VZ-RI's E911 tandems, and VZ-RI had provided over 60 E911 trunks to those CLECs.[572] By September 2001, this number had increased to 63 E911 trunks to the 11 CLECs.[573]

CLECs have the ability to input their own customer information into the E911 database with the same error correction process available to VZ-RI for its retail customers.[574] In fact, CLECs using their own switches are responsible for their own customer information. The information is input and processed on a first-come first-served basis, regardless of whether input by a CLEC or by VZ-RI.[575] According to VZ-RI, as of May 31, 2001, 11 CLECs were using the electronic interface for entry of

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[570] Id. at ¶ 262.
[571] Id. at ¶ 265.
[572] Id. at ¶ 266.
[573] Verizon Post-Hearing Brief, p. 89.
[574] Verizon RI 271 Filing - Checklist Declaration, at ¶ 268.

information into the E911 databases and CLECs using their own switches had over 68,900 E911 subscriber listings in Rhode Island.[576] By September 2001, the 11 CLECs had over 86,860 E911 subscriber listings in Rhode Island.[577]

Calls received at VZ-RI's E911 tandems are routed to the state-run Public Safety Answering Point on a first-come, first-served basis, without regard to service provider. According to VZ-RI, both VZ-RI and CLEC end users use the same dedicated trunks to carry 911 calls from the E911 tandems to the Public Safety Answering Point.[578]

B. Directory Assistance Services

According to VZ-RI, CLECs have the same options for providing directory assistance service to their customers as they do in Massachusetts and New York. First, resellers may resell VZ-RI's retail service. Second, CLECs can purchase VZ-RI's directory assistance service pursuant to interconnection agreements, and VZ-RI will provide directory assistance service directly to CLEC customers. Third, CLECs can establish their own centers to provide directory assistance service to their customers and use VZ-RI's directory assistance database pursuant to interconnection agreements.[579]

As of May 31, 2001, 5 CLECs were purchasing VZ-RI's directory assistance service and interconnecting using approximately 100 dedicated trunk ports and transmission facilities provided by VZ-RI. An additional 35 CLECs and resellers were purchasing VZ-RI's directory assistance service and interconnecting using VZ-RI's

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[575] Id. at ¶¶ 269-74.
[576] Id. at ¶ 275.
[577] Verizon Post-Hearing Brief, p. 90.
[578] Verizon RI 271 Filing - Checklist Declaration, at ¶ 267.
[579] Id. at ¶ 276.

shared transport.[580] By August 31, 2001, the number of CLECs and resellers had risen to 42.[581]

VZ-RI's directory assistance service is available with the CLEC's own brand, unbranded, or with VZ-RI's brand. As of May 31, 2001, VZ-RI provided carrier-specific branding to 8 CLECs, unbranded service to 5 CLECs, and VZ-RI-branded service to 27 CLECs.[582] By August 31, 2001, the number of CLECs choosing VZ-RI-branded service had risen to 34.[583]

VZ-RI also offers Call Connect Service to CLECs purchasing VZ-RI's directory assistance service. A facilities-based CLEC may choose to have these calls completed over its own or VZ-RI's network. As of May 31, 2001, VZ-RI was providing Call Connect Service to 38 CLECs.[584] This number rose to 45 by August 31, 2001.[585]

CLECs can also enter into a Directory Assistance License Agreement, which makes the contents of the directory assistance database for VZ-RI or all of Verizon available to CLECs in an electronic format for their use in providing local directory assistance services. As of May 31, 2001, VZ-RI was providing access to listings to one CLEC pursuant to the Directory Assistance License Agreement.[586]

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[580] Id. at ¶ 277. CLECs that resell VZ-RI's retail services or use VZ-RI's unbundled local switching have the option of purchasing VZ-RI's directory assistance service, or using their own or another carrier's directory assistance centers. As of May 31, 2001, no CLECs were purchasing customized routing from VZ-RI. Id. at ¶ 278.
[581] Verizon Post-Hearing Brief, p. 95.
[582] Verizon RI 271 Filing - Checklist Declaration, ¶ 279.
[583] Verizon Post-Hearing Brief, p. 94.
[584] Verizon RI 271 Filing - Checklist Declaration, ¶ 280.
[585] Tr. 10/12/01, p. 156.
[586] Verizon RI 271 Filing - Checklist Declaration, ¶ 282. For CLECs that establish their own DA centers, VZ-RI offers nondiscriminatory access to its directory assistance listings. VZ-RI offers Direct Access to Directory Assistance ("DADA"), a service that provides "read only" access to the listings in VZ-RI's DA database. DADA is offered pursuant to interconnection agreement. As of May 31, 2001, no CLECs were purchasing VZ-RI's DADA service. Id. at ¶ 281.

VZ-RI asserted that it provides nondiscriminatory access to its directory assistance services by provisioning, maintaining and repairing directory assistance trunks for CLECs using the same facilities, equipment and personnel that VZ-RI uses for its own directory assistance trunks.[587]

VZ-RI also indicated that directory assistance calls from customers of CLECs that use VZ-RI's directory assistance service are handled on a nondiscriminatory basis. Service performance results for 2001 show an average speed of answer at VZ-RI's centers of 3.47 seconds in March, 3.37 seconds in April and 3.68 seconds in May for VZ-RI retail customers and resellers' customers; and 1.61 seconds in March, 1.42 seconds in April and 1.80 seconds in May for customers of CLECs taking UNE Platform and facilities-based CLECs.[588] The months of June, July and August 2001 reflected comparable average speeds.[589]

C. Operator Call Completion Services

VZ-RI stated that CLECs in Rhode Island have the same three options for providing operator call completion ("OCC") services as they do in Massachusetts and New York. First, resellers may resell VZ-RI's retail service. Second, CLECs can purchase VZ-RI's operator call completion service pursuant to interconnection agreements, and VZ-RI will provide operator call completion service directly to CLEC customers. Third, CLECs can establish their own centers to provide operator call completion service by interconnecting with VZ-RI's operator call completion platform so

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[587] Id. at ¶ 383.
[588] Id. at ¶ 384.
[589] Verizon Post-Hearing Brief, p. 95.

that the CLEC and VZ-RI can provide busy line verification and line interrupt services to their respective customers.[590]

When purchasing VZ-RI's operator call completion service, CLECs that use their own switches or VZ-RI's unbundled local switching may interconnect directly with VZ-RI's operator call completion platform using their own facilities, dedicated transport facilities, or shared transport facilities purchased from VZ-RI or another carrier. As of May 31, 2001, 5 CLECs were purchasing VZ-RI's operator call completion service and interconnecting using approximately 100 dedicated trunk ports and transmission facilities provided by VZ-RI and 35 CLECs and resellers were purchasing VZ-RI's operator call completion service and interconnecting using VZ-RI's shared transport.[591] As of August 31, 2001, 42 CLECs and resellers were purchasing VZ-RI's operator call completion service.[592]

VZ-RI's operator call completion service is available with the CLEC's own brand, unbranded, or with VZ-RI's brand. As of May 31, 2001, VZ-RI provided carrier-specific branding to 8 CLECs, unbranded service to 5 CLECs, and VZ-RI-branded service to 27 CLECs.[593] As of August 31, 2001, the number of CLECs choosing VZ-RI-branded service had risen to 34.[594]

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[590] Id. at ¶ 285. In addition, CLECs providing their own OCC centers can interconnect with VZ-RI's Line Information Data Base ("LIDB") to verify telephone number and other billing information. Id. VZ-RI is only able to provide Busy Line Verification ("BLV") and Busy Line Verification with Interrupt ("BLVI") for calls placed to its own end users, or to end users of CLECs that purchase OCC service from VZ-RI or have interconnected with VZ-RI for the purpose of enabling VZ-RI to provide BLV and BLVI. BLV and BLVI are offered pursuant to interconnection agreements. As of May 31, 2001, VZ-RI provided BLV and BLVI to 40 CLECs. Id. at ¶ 290.

[591] Id. at ¶ 287. CLECs that resell VZ-RI's retail services or use VZ-RI's unbundled local switching have the option of purchasing VZ-RI's operator call completion service, or using their own or another carrier's operator call completion centers. As of May 31, 2001, no CLECs were taking advantage of VZ-RI's offer of customized routing. Id. at ¶ 288.

[592] Tr. 10/12/01, p. 158.

[593] Verizon RI 271 Filing - Checklist Declaration. ¶ 289.

[594] Tr. 10/12/01, p. 116.

VZ-RI asserted that it provides the same operator call completion service to CLECs that it provides to itself and that it provides nondiscriminatory access to its operator call completion services. VZ-RI states that it provisions, maintains, and repairs OCC trunks for CLECs using the same facilities, equipment and personnel in through the same process that VZ-RI uses for its own operator call completion trunks.[595]

Furthermore, VZ-RI indicated that calls from customers of CLECs that use VZ-RI's operator call completion service are handled on a nondiscriminatory basis. Service performance results for 2001 show an average speed of answer at VZ-RI's centers of 2.05 seconds in March, 2.08 seconds in April and 2.35 seconds in May for VZ-RI retail customers and resellers' customers; and 0.18 seconds in March, 0.18 seconds in April and 0.21 seconds in May for customers of CLECs taking UNE Platform and facilities-based CLECs.[596]

3. CLEC Comments

No CLEC filed any declarations or made any comments at the hearings disputing VZ-RI's performance in providing the required access under Checklist Item 7.

4. RIDPUC's Position

The RIDPUC noted that VZ-RI stated that it was providing access to 911/E911, directory assistance and operator call services in substantially the same time and manner and at an acceptable level of quality as it was providing to itself, its affiliates and subsidiaries. The RIDPUC indicated that it agreed with VZ-RI's assertions and recommended a finding of compliance with Checklist Item 7 by the RIPUC.[597]

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[595] Id. at ¶ 291.
[596] Id. at ¶ 292.

5. RIPUC Findings and Recommendation

We find VZ-RI to be in compliance with the requirements of Checklist Item 7. As of September 2001, VZ-RI was providing interconnection to 11 CLECs at each of its two E911 tandems. At that time, VZ-RI had provided 63 trunks to those CLECs. Listings for the 11 CLECs accounted for 85,868 E911 subscriber listings in Rhode Island. Therefore, VZ-RI has provided access to E911 services.

We also note that as of August 31, 2001, 47 CLECs were purchasing directory assistance services, both branded and unbranded. VZ-RI has also shown that CLEC customers using VZ-RI's directory assistance service received service on a better than parity basis.[598] Finally, VZ-RI has shown that it offers operator call completion services to CLEC customers on a nondiscriminatory basis.[599] Therefore, we find that VZ-RI provides nondiscriminatory access to 911/E911 services, directory assistance services and operator call completion services and recommend that the FCC find that VZ-RI has complied with the requirements of this checklist item.

H. CHECKLIST ITEM 8 – WHITE PAGES DIRECTORY LISTINGS

1. Applicable Law

Section 271(c)(2)(B)(viii) requires VZ-RI to provide "[w]hite pages directory listings for customers of the other carrier's telephone exchange service."[600] The FCC has indicated that in order to satisfy Checklist Item 8, VZ-RI must satisfy two requirements. First, it must provide listings of CLEC customer information with the same accuracy and reliability as it provides for its own customers. Second, the information related to CLEC

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[597] RIDPUC's Exhibit 1, Appendix A, p. 7.

[598] Between June and August 2001, VZ-RI reported that VZ-RI customers' inquiries were answered in an average of 3.7 seconds while CLEC customers' inquiries were answered in an average of 1.83 seconds.

[599] Between June and August 2001, VZ-RI reported that VZ-RI customers' OCC calls were answered in an average of 2.58 seconds while CLEC customers' OCC calls were answered in an average of .22 seconds.

customers must appear the same in the white pages directory as the information related to Verizon customers.[601]

2.   VZ-RI's Position

VZ-RI asserted that it provides nondiscriminatory access to directory listings in accordance with the Act and FCC rules.[602] VZ-RI stated that it provides for the nondiscriminatory appearance of White Pages directory listings for CLEC customers. In addition, CLEC business customers are entitled to a basic Yellow Page listing at no charge. According to VZ-RI, the listing service order data for VZ-RI, CLEC and reseller customers are processed in the same manner, regardless of the origin. The rates charged are consistent with those filed in VZ-RI's resale tariff, PUC RI No. 22 and RIPUC-approved interconnection agreements. Furthermore, CLECs can advertise in the introductory pages of the White Pages, free of charge, under the section entitled "Local Telephone Service Providers." As of May 31, 2001, VZ-RI calculated it had provided 54,202 CLEC and reseller customer listings in the VZ-RI White Pages.[603]

In addition, VZ-RI indicated it has a verification system in place allowing CLECs the same opportunity to verify the accuracy of their customers' listings prior to publication in the White and/or Yellow Page Directories as VZ-RI has for its customers. From January 1, 2000 through June 30, 2001, Verizon issued 3,048 Listing Verification Reports to CLECs in New England. Furthermore, during the twelve months prior to the filing of its Checklist Declarations and through October 2001, VZ-RI had not received

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[600] 47 U.S.C. § 271(c)(2)(B)(viii).

[601] New York Order, ¶¶ 358-59.

[602] Verizon RI 271 Filing – Checklist Declaration, ¶ 294. According to VZ-RI, publishing responsibility for White Page and Yellow Page directory is held by Verizon Yellow Pages Company, an indirect wholly-owned subsidiary of Verizon Communications, Inc. Id. at ¶ 297.

[603] Id. at ¶¶ 294-96, 298-99.

any complaints from CLECs regarding the accuracy of their Rhode Island directory listings.[604]

3. CLEC Comments

No CLEC filed any declarations or made any comments at the hearings disputing VZ-RI's performance in providing the required access under Checklist Item 8.

4. RIDPUC's Position

The RIDPUC noted that VZ-RI's assertions indicated that VZ-RI grants competing carriers access to White Pages listings in substantially the same time and manner as it provisions such arrangements to itself, its affiliates and subsidiaries. The RIDPUC recommended that the RIPUC find that VZ-RI is in compliance with Checklist Item 8.[605]

5. RIPUC Findings and Recommendation

We find VZ-RI to be in compliance with the requirements of Checklist Item 8. We note that as of August 31, 2001, VZ-RI's White Pages database for Rhode Island contained 61,660 listings for CLEC and resellers' customers. Moreover, during the last year, VZ-RI did not received any complaints from CLECs regarding the accuracy of their customers' listings in the Rhode Island directory. Therefore, we find that VZ-RI provides White Page directory listings to CLEC customers in an accurate manner and provides nondiscriminatory access to directory listings by CLECs and resellers. We recommend the FCC find VZ-RI to be in compliance with this checklist item.

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[604] Id. at ¶¶ 300-05.
[605] RIDPUC Exhibit 1, Appendix A, p. 8.

I.   CHECKLIST ITEM 9 – ACCESS TO TELEPHONE NUMBERS

1.   Applicable Law

Section 271(c)(2)(B)(ix) of the Act requires VZ-RI to provide "nondiscriminatory access to telephone numbers for assignment to other carriers' customers until the date that numbering administration guidelines, plan or rules are established."[606]

In 1998, the FCC designated NeuStar, Inc. ("NeuStar") as the North American Numbering Plan Administrator. NeuStar has the responsibility of assigning blocks of telephone numbers ("NXX codes") to ILECs and CLECs within each area code, and for coordinating area code planning efforts, in cases of anticipated area code exhaustion, with state commissions.[607] Therefore, VZ-RI "must demonstrate that it adheres to industry numbering administration guidelines and Commission rules, including provisions requiring the accurate reporting of data to the code administrator."[608]

2.   VZ-RI's Position

VZ-RI represented that it has transferred its responsibility for assigning NXX codes to NeuStar. VZ-RI also asserted that it adheres in a timely and accurate manner to all industry numbering administration guidelines and FCC rules, including provisions requiring the accurate reporting of data to the code administrator NeuStar.[609] Finally, VZ-RI noted that as of May 31, 2001, approximately 255 NXX codes had been assigned to CLECs in Rhode Island. As a result of these assignments, approximately 2,550,000 individual telephone numbers are available to CLECs in Rhode Island.[610]

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[606] 47 U.S.C. § 271(c)(2)(B)(ix).
[607] New York Order, ¶ 363.
[608] Id.
[609] Verizon RI 271 Filing – Checklist Declaration, ¶¶ 313, 315.
[610] Id. at ¶ 314.

3. CLEC Comments

No CLEC filed any declarations or made any comments at the hearings disputing VZ-RI's performance in providing the required access under Checklist Item 9.

4. RIDPUC's Position

The RIDPUC noted that VZ-RI had transferred numbering administration to an independent third party. Thus, the RIDPUC determined that CLECs had access to NXX codes in substantially the same manner and time as VZ-RI. The RIDPUC recommended a finding of compliance with Checklist Item 9.

5. RIPUC Findings and Recommendation

We find VZ-RI to be in compliance with the requirements of Checklist Item 9. VZ-RI has shown that it has transferred its responsibility for assignment of telephone numbers to NeuStar. Therefore, telephone numbers are assigned to VZ-RI and CLECs in the same manner and approximately 2.5 million individual telephone numbers are aailable to CLECs in Rhode Island. We recommend the FCC find VZ-RI to be in compliance with the requirements of this checklist item.

J. CHECKLIST ITEM 10 – DATABASES AND SIGNALING

1. Applicable Law

Section 271(c)(2)(B)(x) requires VZ-RI provide "[n]ondiscriminatory access to databases and associated signaling necessary for call routing and completion."[611] The FCC has previously required a BOC to prove that it was providing requesting carriers with non-discriminatory access to: "(1) signaling networks, including signaling links and signaling transfer points; (2) certain call-related databases necessary for call routing and completion, or in the alternative, a means of physical access to the signaling transfer

point linked to the unbundled database; (3) Service Management Systems ("SMS"); (4) and to design, create, test and deploy Advanced Intelligent Network ("AIN") based services at the SMS through a Service Creation Environment."[612] Furthermore, the FCC has implemented rules that require that an incumbent LEC provide access to the following databases: Line Information database ("LIDB"), Toll Free Calling database, downstream number portability databases, and AIN database.[613]

2. VZ-RI's Position

It is VZ-RI's position that it has a proven track record of providing non-discriminatory access to its call-related databases and the associated signaling necessary for call routing and completion. This track record is based on decades of transactions between VZ-RI and long-distance carriers. VZ-RI has indicated that there are no technical differences between the practices of processing queries and exchanging messages with long-distance carriers and processing queries and exchanging messages for CLECs. In addition, VZ-RI relied on the assertion that it uses the same signaling networks, call-related databases, and service management systems for Rhode Island as it does for Massachusetts, where both the DTE and the FCC found that Verizon met the requirements of this checklist item.[614]

A. Signaling

VZ-RI has stated that it provides CLECs access to its signaling links and signaling transfer points ("STPs") on an unbundled basis.[615] According to VZ-RI, the access arrangements allow a CLEC to utilize VZ-RI's Common Channel Signaling

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[611] 47 U.S.C. § 271(c)(2)(B)(x).

[612] Second BellSouth Louisiana Order, 13 FCC Rcd at 20755-56.

[613] 47 C.F.R. § 51.319(e).

[614] Verizon RI 271 Filing – Checklist Declaration, ¶ 322; See Verizon Post-Hearing Brief, p. 102.

[615] Verizon RI 271 Filing – Checklist Declaration, ¶ 323.

System No. 7 ("SS7") network, either on a shared or a dedicated basis, for signaling between its own switches, between its own switches and VZ-RI's switches, and between its own switches and the networks of parties connected to VZ-RI's SS7 network.[616] Access to VZ-RI's SS7 network is provided through a signaling link between the carrier's switches and a VZ-RI STP, or between the carrier's STP and VZ-RI STP. VZ-RI has indicated that the same facilities, equipment, and personnel are used to provision signaling links for CLECs and itself. According to VZ-RI, all signaling traffic on VZ-RI's network is commingled and is queued and routed on a non-discriminatory basis.[617]

A CLEC can order an unbundled signaling link between its switch and the VZ-RI STP and VZ-RI indicated that it provides access to its signaling network in the same manner that it provides access to itself. In fact, VZ-RI asserted that there is no operational distinction between a call originated from a VZ-RI customer and a call originated from a customer of a CLEC that has purchased unbundled local switching because VZ-RI uses the same facilities, equipment, and personnel to provide signaling links for CLECs and for itself.[618]

VZ-RI noted that as of September 30, 2001, it was providing two CLECs in Rhode Island with access to its signaling network through its federal access tariff offering. No CLECs had requested unbundled access to VZ-RI signaling network. However, VZ-RI stated that it is prepared to provide such unbundled access.[619]

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[616] Id.
[617] Verizon RI 271 Filing – Checklist Declaration, ¶ 324.
[618] Id. at ¶ 327.
[619] Id. at ¶ 328; VZ-RI's Response to Record Request No. 28.

B.   Call-Related Databases

VZ-RI also asserted that it provides competing carriers with access to "call-related databases," or service control points ("SCPs"), which are used in the signaling networks for transmission, routing, billing, and collection.[620] These databases also provide the translation and routing data needed to deliver advanced network services. Verizon currently has four call-related databases: (1) LIDB, which provides access to the Calling Name Information Database ("CNAM"); (2) Toll Free Database (e.g., 800/888/877/866); (3) Local Number Portability Database ("LNP"), and (4) AIN. Each of these four call-related databases is available to CLECs on an unbundled basis.[621]

According to VZ-RI, a CLEC purchasing unbundled local switching can use VZ-RI's call-related databases in the same manner, and through the same type of signaling links, as VZ-RI. A requesting carrier that has deployed its own switch and linked that switch to VZ-RI's signaling system, gains access to VZ-RI's SCPs through an STP. This arrangement allows the CLEC to provide call-related, database-supported services to its end-user customers.[622]

VZ-RI pointed out that use of its call-related databases is extensive. For instance, VZ-RI indicated that during the year 2000, Verizon processed 60.5 million billing verification queries of its LIDB for other carriers throughout New England, and in the first seven months of this year, it processed approximately 25.8 million queries.[623] VZ-RI noted that other carriers also make extensive usage of Verizon's Toll Free Database in that Verizon processed more than 6.8 billion Toll Free Database queries throughout the

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[620] Verizon RI 271 Filing – Checklist Declaration, ¶ 330.
[621] Id. at ¶ 330.
[622] Id. at ¶ 331.
[623] Tr. 10/12/01, p. 170; Verizon RI 271 Filing – Checklist Declaration, ¶ 338.

former Bell Atlantic North territory (New York and New England) during the year 2000, of which 231.6 million queries were for Rhode Island. VZ-RI indicated that from January 1, 2001 through September 30, 2001, Verizon processed 5.1 billion queries in New York and New England combined, of which 159.8 million were for Rhode Island.[624]

C.   Service Management Systems

VZ-RI stated that it provides competing carriers with access to its SMS, which enables competitors to enter, modify, or delete entries for their own customers in VZ-RI's other databases. VZ-RI also indicated that it provides CLECs with access to the SMS associated with each of the three call-related databases noted above and gives carriers the information necessary to enter information into VZ-RI's SMS.[625]

VZ-RI noted that because the SMS for the Toll Free Database is administered by a neutral third party, all carriers, VZ-RI and CLECs alike, obtain access in the same way. VZ-RI stated that it provides access to the SMS associated with the AIN database through the service creation environment, scheduled on a case-by-case basis. The SS7 interconnection intervals, as well as the intervals for access to LIDB, Toll Free Database, LNP database, and AIN, are negotiated.[626]

3.   CLEC Comments

No CLEC filed any declarations or made any comments at the hearings disputing VZ-RI's performance in providing the required access under Checklist Item 10.

4.   RIDPUC's Position

The RIDPUC noted that VZ-RI stated that it was providing access to its signaling networks to competing carriers in substantially the same time and manner and at an

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[624] Verizon RI 271 Filing – Checklist Declaration, ¶ 346; Tr. 10/12/01, p. 170-71.
[625] Verizon RI 271 Filing – Checklist Declaration, ¶ 362.
[626] Id. at ¶¶ 363-65.